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Attorneys for Movant Blake Lively

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

BLAKE LIVELY,)	CASE NO.: 2:25-mc-00055
)	
Movant,)	DECLARATION OF ESRA A.
)	HUDSON IN SUPPORT OF
v.)	MOVANT BLAKE LIVELY'S
)	POSITION IN THE JOINT
TERA HANKS, ASHMI)	STIPULATION REGARDING
ELIZABETH DANG, AHMED)	MOVANT'S MOTION TO
MUSIOL, MITZ TOSKOVIC, AJ)	COMPEL DISCOVERY
MARBORY, JENNIFER)	
BENSON, SHEKINAH REESE,)	
and JARRIESSE BLACKMON,)	
)	
Respondents.)	

1 I, Esra A. Hudson, declare as follows:

2 1. I am an attorney at law licensed to practice in the State of California. I
3 am a partner with the law firm of Manatt, Phelps & Phillips LLP and counsel of
4 record for Movant Blake Lively (“Ms. Lively” or “Movant”) in the above-entitled
5 action.

6 2. I submit this declaration in support of Movant’s Position in the Joint
7 Stipulation Regarding Movant’s Motion to Compel Discovery (the “Stipulation”).

8 3. A true and correct copy of the operative complaint (the “Lively
9 Complaint”) filed by Ms. Lively in *Lively v. Wayfarer Studios, et al.*, 1:24-cv-10049
10 (S.D.N.Y.) (the “Lively Action”) is attached as Exhibit A.

11 4. A true and correct copy of the operative complaint (the “Wayfarer
12 Complaint”) filed by Wayfarer Studios LLC (“Wayfarer”), Justin Baldoni, Jamey
13 Heath, It Ends With Us Movie LLC, Melissa Nathan, Jennifer Abel, and Steve
14 Sarowitz (the “Wayfarer Parties”)¹ in *Wayfarer Studios LLC v. Lively, et al.*, 1:25-
15 cv-00449 (S.D.N.Y.) (the “Wayfarer Action”) (together, with the Lively Action, the
16 “Actions”) is attached as Exhibit B.

17 5. A true and correct copy of the subpoena served by Ms. Lively on Tera
18 Hanks in connection with the Actions is attached as Exhibit C.

19 6. A true and correct copy of the subpoena served by Ms. Lively on Mitz
20 Toskovic in connection with the Actions is attached as Exhibit D.

21 7. A true and correct copy of the subpoena served by Ms. Lively on
22 Ahmed Musiol in connection with the Actions is attached as Exhibit E.

23 8. A true and correct copy of the subpoena served by Ms. Lively on Ashmi
24 Elizabeth Dang in connection with the Actions is attached as Exhibit F.

25 9. A true and correct copy of the subpoena served by Ms. Lively on
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28 ¹ For purposes of this Motion, Wayfarer Parties also includes The Agency Group PR LLC, who is a
defendant in the Lively Action but not a plaintiff in in the Wayfarer Action.

1 Shekinah Reese in connection with the Actions is attached as Exhibit G.

2 10. A true and correct copy of the subpoena served by Ms. Lively on
3 Jariesse Blackmon in connection with the Actions is attached as Exhibit H.

4 11. A true and correct copy of the subpoena served by Ms. Lively on AJ
5 Marbory in connection with the Actions is attached as Exhibit I.

6 12. A true and correct copy of the subpoena served by Ms. Lively on
7 Jennifer Benson in connection with the Actions is attached as Exhibit J.

8 13. A true and correct copy of Ms. Lively's conferral letter, dated May 19,
9 2025, is attached as Exhibit K.

10 I declare under penalty of perjury under the laws of the United States of
11 America that the foregoing is true and correct, and that this declaration was executed
12 in Los Angeles, California, on June 6, 2025.

13
14 /s/ Esra A. Hudson

15 Esra A. Hudson
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